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UNITED STATES DISTRICT COURT
 FOR THE SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	CIVIL NO.: 51-CV-1247-GPC-RBB
)	
Plaintiff,)	JOINT MOTION TO EXTEND STAY
)	
RAMONA BAND OF CAHUILLA, CAHUILLA)	
BAND OF INDIANS,)	Date: No hearing date set
)	Time:
Plaintiff-Intervenors,)	Dept: 9
)	
v.)	Hon. Gonzalo P. Curiel
)	
FALLBROOK PUBLIC UTILITY DISTRICT, et al.,)	
)	
Defendants.)	ORAL ARGUMENT NOT REQUIRED
)	
)	

1 Plaintiff-Intervenors Cahuilla Band of Indians and Ramona Band of Cahuilla ("Tribes")
2 hereby move for a 120-day extension of the stay of litigation until May 24, 2013. Pursuant to this
3 Court's Order of October 26, 2012, the stay expires on January 25, 2013. Doc. No. 5403. Counsel
4 for the Ramona Band of Cahuilla has contacted counsel for the Settlement Parties to confer about
5 this Joint Motion. Counsel is authorized to state that the United States; the State of California;
6 County of Riverside; Riverside County Flood Control and Water Conservation District; Alvin
7 Greenwald; the Hemet Unified School District; and Agri-Empire support this request to extend the
8 stay. The Anza Basin Landowners Group does not oppose this Joint Motion.

9 Settlement continues to be a viable approach to resolving the Tribes' water rights claims.
10 Substantial progress has been achieved toward a negotiated settlement since the last report to this
11 Court on September 27, 2012. The same parties and their consultants continue to be actively
12 engaged in the discussions. A Technical Committee comprised of the Santa Margarita River
13 Watershed Watermaster and various consultants of the parties continues to provide technical advice
14 and assistance to the Settlement Parties in these discussions.

15 The parties have conducted extensive and wide-ranging discussions by telephonic meetings
16 and by in-person meetings, both as a group and among smaller subsets of the parties. Telephone
17 meetings were held on October 19, 2012; November 27, 2012; and January 24, 2013. The parties
18 reported by telephone on their progress to Magistrate Judge Brooks on October 19, 2012. In
19 addition, the Cahuilla Band of Indians and Agri-Empire have continued their discussions of issues
20 unique to those parties, and reported their progress to Magistrate Judge Brooks on October 17, 2012.
21 Finally, the Tribes have met to continue discussions related to issues of concern unique to them.

22 A draft settlement agreement is progressing toward completion. The broad outlines of
23 settlement have largely been finalized. The parties will meet in the coming weeks to attempt to
24 resolve a number of outstanding drafting issues. The Tribes believe the unresolved issues continue
25 to be narrowed and that an extension of the stay is justified in order to allow the parties to devote
26 their time and resources to a negotiated resolution of the Tribes' claims without the distraction,
27 costs, and burdens of litigation.

1 Based on the foregoing report of progress in the settlement discussions, the Tribes
2 respectfully request that the stay be extended until May 24, 2013.

3
4 Date: January 25, 2013

Respectfully submitted,

5 Marco A. Gonzalez (SBN 190832)
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24 *Ramona Band of Cahuilla*

DECLARATION OF SERVICE

I, the undersigned, declare as follows:

I am a citizen of the United States of America, over the age of 18 years, and not a party to the above-entitled action. My business address is 2030 Addison Street, Suite 410, Berkeley, California, 94704.

On January 25, 2013, I electronically filed on behalf of the Cahuilla Band of Indians and the Ramona Band of Cahuilla the following documents in United States of America, et al. v. Fallbrook Public Utility District, et al., Case No. 51-cv-1247-GPC-RBB:

1) **JOINT MOTION TO EXTEND STAY**

by using the CM/ECF system, which generated and transmitted a notice of electronic filing to the following CM/ECF registrants:

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I further certify that on January 25, 2013, I caused to be served the following document:

1) **NOTICE OF ELECTRONIC FILING (Docket # 5407)**

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I declare under penalty of perjury that the foregoing is true and correct, and that this Declaration was executed on January 25, 2013, at Berkeley, California.



Martha Morales